

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ODS CAPITAL LLC, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

QIHOO 360 TECHNOLOGY CO. LTD.,  
HONGYI ZHOU, XIANGDONG QI and  
ERIC X. CHEN,

Defendants.

Case No. 1:19-cv-00501-PAE

CLASS ACTION

DECLARATION OF CHRISTOPHER. J.  
KELLER IN SUPPORT OF  
STIPULATION AND ORDER OF  
SUBSTITUTION OF COUNSEL

**DECLARATION OF CHRISTOPHER J. KELLER IN SUPPORT OF STIPULATION  
AND ORDER OF SUBSTITUTION OF COUNSEL**

I, CHRISTOPHER J. KELLER, state as follows under the penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an attorney for Labaton Sucharow LLP (“Labaton Sucharow” or “Counsel”), and as such I am fully familiar with the facts of this case.

2. I submit this declaration in support of the Stipulation and Order of Substitution of Counsel to substitute the law firm of Pomerantz LLP (“Pomerantz”) as the attorneys of record for plaintiff ODS Capital LLC (“ODS Capital”) in place and instead of its current counsel.

3. Because this case is still in its initial stages, the requested substitution of counsel will not unnecessarily delay this action, and undersigned counsel respectfully requests that the Court approve the Stipulation and Order of Substitution submitted herewith.

4. Plaintiff ODS Capital has consented to the substitution of attorneys, as evidenced in the Consent to Substitute Counsel accompanying this Declaration.

5. Labaton Sucharow and Pomerantz have both executed the Stipulation and Order of Substitution of Counsel accompanying this Declaration.

6. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

DATED: March 16, 2019

/s/ Christopher J. Keller  
Christopher J. Keller  
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